

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**IN RE:  
HELEN ELLIS**

**Debtor**

) **CASE NO: 19-45173-659**  
) **Chapter 13**  
)  
) **Trustee's Objection to Confirmation**  
) **Original Confirmation Hearing set for :**  
) **December 12, 2019 11:00 am**

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. Debtor should file an amended Schedule I to reflect current employment and income.
2. The plan fails to pay the full attorney fee owed per the 2016(b) form.
3. The plan is ambiguous or incapable of ascertainment (11 U.S.C. §§ 1321 & 1325(a)(3)) because:  
Although apartment lease is paid by debtor per Schedule J, it is addressed in 3.3c as a continuing debt paid by the trustee. This makes the plan unfeasible.
4. The Debtor has not filed 2018 state and federal pre-petition tax returns. 11 U.S.C. § 1325(a)(9).
5. It appears that Planet Rent to Own is a lease, and should be on Schedule G and removed from Schedule D, and addressed as a lease in the plan. The collateral must also be described.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: November 08, 2019

OBJCONF-CLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on November 08, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on November 08, 2019.

HELEN ELLIS  
11324 HI TOWER DR  
ST ANN, MO 63074

/s/ Kathy Wright

Kathy Wright MO31047